

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

STATE OF TEXAS,

Plaintiff,

V.

3M COMPANY; CORTEVA, INC., DUPONT
DE NEMOURS, INC., and EIDP, INC. F/K/A
E. I. DU PONT DE NEMOURS AND
COMPANY,

Defendants.

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Civil Action No. 3:25-cv-00122-K

PLAINTIFF'S MOTION TO REMAND TO STATE COURT

Plaintiff State of Texas files this Motion to Remand this case to State Court and would respectfully show the Court as follows:

Plaintiff has simultaneously filed a Brief in Support of this Motion, which are by this reference fully incorporated herein and outline the arguments relating to same. Plaintiff respectfully requests that this Motion be granted and that this case be remanded to the 18th Judicial District of Johnson County, Texas, for adjudication and that the Court award the State attorneys' fees and costs for 3M's improper removal of this case.

WHEREFORE, PREMISED CONSIDERED, Plaintiff respectfully prays that this Motion be granted and for such other and further relief to which it may be justly entitled.

Dated: February 5, 2025

Respectfully Submitted,

KEN PAXTON

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ATTORNEYS FOR THE STATE OF TEXAS

CERTIFICATE OF CONFERENCE

I certify that counsel for the parties have conferred and that Defendants are opposed to the relief requested herein. On January 29, 2025, Lauren Shah, counsel for Plaintiff, emailed counsel for the Defendants concerning their position on Plaintiff's Motion. Plaintiff's counsel indicated that removal is not proper under either theory posited in 3M's removal papers. On January 31, 2025, Greg Costa, counsel for Defendant 3M, and Britta Todd, counsel for the DuPont Defendants, indicated that the Defendants oppose Plaintiff's Motion.

/s/ Scotty MacLean
SCOTTY MACLEAN
Local counsel for Plaintiff

CERTIFICATE OF SERVICE

I certify that on this 5th day of February 2025, a true and correct copy of the foregoing document was served by email and/or by electronic filing service on all counsel of record via the Court's CM/ECF system.

/s/ Scotty MacLean
SCOTTY MACLEAN
Local counsel for Plaintiff